

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
	)	
v.	)	CRIMINAL NO. 04-10274-PBS
	)	
	)	
TONY DIAZ,	)	
a/k/a Jose A. Rivera, Jr.,	)	
a/k/a Santo Romero Villar,	)	
a/ka/ Jose Rivera Morales,	)	
a/k/a Jose Antoni Morales,	)	
a/k/a Santo Rodolfo Romero Villar,	)	
Defendant.	)	

**GOVERNMENT'S SUMMARY OF EXPERT TESTIMONY**

Pursuant to the Fed. R. Crim. P. 16(a)(1)(E), the government hereby discloses a written summary of the testimony and qualifications of Alan Offringa, a firearms and ammunition expert who will testify at trial. With respect to the substance of Mr. Offringa's testimony, he will testify regarding the operation of handguns and specifically, about how the action of pulling back the slide causes a round to be chambered, preparing the gun to shoot. The basis for Mr. Offringa's opinion is his familiarity with handguns through his more than thirty years of experience with firearms. It is anticipated that he will testify that the .45 caliber handgun and associated ammunition (charged in Counts One and Two of the Indictment) are what they appear to be (the handgun is, in fact, a firearm and the ammunition is, in fact, ammunition for purposes of federal law).

With regard to Mr. Offringa's qualifications, he is a recognized expert in firearms and ammunition. He was an ATF Agent for approximately 30 years. Prior to becoming an ATF

agent, he was a special agent with the United States Customs Service. Prior to that he was a police officer. Special Agent Offringa was also a federally licensed firearms dealer.

Special Agent Offringa has attended numerous armorer schools, including Remington, Glock, and Sigsauer. He served as the firearms instructor/coordinator and the firearms and ammunition examiner for the New England Field Division of ATF. Among other duties that those assignments entail, he was responsible for examining firearms and ammunition to determine their place of manufacture.

Special Agent Offringa has been involved in the study of firearms and ammunition for over 30 years and he keeps an extensive personal library of resource materials relating to that subject area.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Paul R. Moore  
Paul R. Moore  
Assistant U.S. Attorney

DATE: June 24, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney for defendant Tony Diaz, Michael J. Liston, Esq., on June 24, 2005, via first class mail.

/s/ Paul R. Moore  
Paul R. Moore  
Assistant U.S. Attorney